

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:20-cv-00947-TMC

MOTION TO AMEND COMPLAINT

Plaintiffs, Jane Does 1-9, by and through their undersigned counsel, respectfully moves this Court for leave to amend their Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure. Plaintiffs request leave to amend their Complaint in order to properly name a foreign Defendant Pornhub.com. Plaintiffs' counsel has conferred with counsel for the foreign Defendant Pornhub.com and has reached an agreement. Once the Complaint is amended such that it reflects the correct corporate entity for Pornhub.com, Defendants will waive service, resolving Plaintiffs current problems with service of the foreign entity, Defendant Pornhub.com

A copy of the proposed Second Amended Complaint is attached hereto as Exhibit 1. In support of this Motion, Plaintiffs rely on the statements herein, the pleadings filed in this case, the rules of Court and such other matters as may be properly presented to the Court. Plaintiffs have conferred with counsel for the Defendants Limestone College and Murphy prior to filing this Motion and received no objections from Defendant Limestone College. Defendant Murphy provided consent to amend.

Therefore, the Plaintiffs respectfully requests this Court enter an Order granting Plaintiffs' Motion to file a Second Amended Complaint.

WE SO MOVE:

BELL LEGAL GROUP, LLC

s/ J. Edward Bell, III

J. Edward Bell, III (#1280)

Joshua M. W. Salley (#13214)

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ATTORNEYS FOR THE PLAINTIFFS

WE SO CONSENT:

HALL, BOOTH, SMITH, P.C.

/s/ Alan Belcher

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June 15, 2020

Georgetown, South Carolina